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for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

STEVEN B. MENDELOW, NANCY  
MENDELOW, CARA MENDELOW, PAMELA  
CHRISTIAN, C&P ASSOCIATES, LTD., and  
C&P ASSOCIATES, INC.,

Defendants.

Adv. Pro. No. 10-04283 (SMB)

**STIPULATION AND ORDER HOLDING THE DISCOVERY SCHEDULE  
SET FORTH IN THE CASE MANAGEMENT PLAN IN ABEYANCE**

WHEREAS, on January 23, 2015, the Court so ordered a Case Management Plan that was jointly submitted by plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, and the above-captioned Defendants (individually and collectively, the “Defendants”) (Defendants and the Trustee collectively the “Parties”); and

WHEREAS, the Case Management Plan originally provided that all fact discovery was to be completed on or before January 29, 2016; and

WHEREAS, on October 28, 2015, the Court held oral argument on the Defendants’ Motion for Judgment on the Pleadings (the “Hearing”), where the Court held on the record that (a) the Trustee should have the opportunity to seek leave to file an amended complaint, and (b) discovery should be held in abeyance pending the resolution of the Trustee’s Motion for Leave to File an Amended Complaint.

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, that the dates contained in the January 23, 2015 Case Management Plan are extended from the date of the Hearing and will be held in abeyance pending a decision by the Court on the Trustee’s Motion for Leave to File an Amended Complaint and the Defendants’ Motion for Judgment on the Pleadings.

IT IS FURTHER STIPULATED AND AGREED that the Parties will work in good faith to set new dates in a revised case management plan to be submitted to the Court upon the Court’s determination of the pending motions.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the

same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original.

Dated as of: February 24, 2016

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Mendelow, Pamela Mendelow, C&P  
Associates, Ltd., and C&P Associates, Inc.*

**SO ORDERED**

**Dated: February 24<sup>th</sup>, 2016**  
**New York, New York**

/s/ STUART M. BERNSTEIN  
**HONORABLE STUART M. BERNSTEIN**  
**UNITED STATES BANKRUPTCY JUDGE**